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Attorneys for Defendants

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ESTATE OF SAOUN POL and J.P.,
Plaintiffs,
vs.
CITY OF STOCKTON,
Defendants.

Case No.: 2:21-cv-00788-WBS-AC

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO COMPLAINT**

[Local Rule 144(a)]

[No hearing required]

1 This Stipulation is respectfully submitted by all named parties: Plaintiffs Estate of
2 Saoun Pol, by and through real party in interest J.P. (both in his representative capacity,
3 as successor in interest on behalf of the estate, and in his individual capacity, on his
4 own behalf), on the one hand, and Defendants City of Stockton (also named as
5 "Stockton Police Department") (the "City"), Chief of Police Eric Jones, Officer Jorge
6 Andrade, and Officer Bradley Miller, on the other hand, all through their undersigned
7 counsel of record.

8 RECITALS

9 A. On May 3, 2021, Plaintiffs filed this lawsuit.

10 B. On or about May 5, 2021, Plaintiffs served process on the City and
11 Officers Andrade and Miller.

12 C. Counsel for Defendants have only recently been retained to represent all
13 named Defendants.

14 D. Counsel for Defendants represent they need additional time to review the
15 Complaint and determine the appropriate response and prepare it.

16 E. Counsel for Defendants requested Plaintiffs' counsel grant them an
17 extension of time of 28 days, and Plaintiffs' counsel is agreeable to that.

18 F. Counsel for Defendants will deem Chief Jones to have been served so
19 that Plaintiff need not serve him.

20 STIPULATION

21 IT IS STIPULATED AND AGREED, by the parties, through their counsel of
22 record that Defendants have an extension of time, through and including June 23,
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2021, to move, plead, or otherwise respond to the Complaint, and Plaintiffs need not
serve process on Chief Jones.

Dated: May 25, 2021

HERUM CRABTREE SUNTAG
A California Professional Corporation

By: /s/ Dana A. Suntag
DANA A. SUNTAG
Attorneys for all Defendants

Dated May 25, 2021

LAW OFFICE OF MARK E. MERIN

By: _____
MARK E. MERIN
PAUL H. MASUHARA
Attorneys for all Plaintiffs